

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES of AMERICA :	:	CRIMINAL NO.
	:	
vs.	:	
	:	
RANDY TALADA and	:	18 USC § 371 (1 count)
SANDY TALADA	:	26 USC § 7201 (1 count)
Defendants	:	

I N F O R M A T I O N

THE UNITED STATES CHARGES:

COUNT 1

Beginning on or about the year 2006, and continuing to the date of this information, both dates being approximate and inclusive, in Bradford County, within the Middle District of Pennsylvania, and elsewhere the Defendant,

RANDY TALADA,

knowingly and willfully conspired and agreed with persons known and unknown to the United States to violate the laws of the United States, that is,

- i. Title 18, United States Code, Section 1341, mail fraud; and
- ii. Title 26, United States Code, Section 7201, tax evasion.

OBJECTS

The objects of the conspiracy were:

- a. to make a financial profit for the defendant; and
- b. to evade the payment of taxes.

MANNER AND MEANS

It was part of the conspiracy that the defendant, and others known and unknown the United States, would provide false information to the defendant's treating physician, exaggerating the defendant's physical ailments and complaints, thereby causing the defendant's physician to misdiagnose the defendant's ability to work and maintain gainful employment.

It was further part of the conspiracy that the defendant, and others known and unknown to the United States, would cause false and fraudulent claims and supporting documentation to be submitted to the Pennsylvania Workers' Insurance Fund and the United States Social Security Administration via United States mail.

It was further part of the conspiracy that the defendant, and others known and unknown to the United States, to submit false and fraudulent tax returns to the United States Internal Revenue Service, in order to evade payment of taxes due and owing.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the conspirators took the following overt acts, among others:

a. On or about April 26, 2012, the defendant signed and caused to be placed in the United States mail to the Pennsylvania State Workers' Insurance Fund a Form 750, indicating that the defendant did not work during the duration of the time he filed his claim for workers' compensation.

b. On or about April 15, 2011, the defendant and a co-conspirator filed a false and fraudulent tax return with the United States Internal Revenue Service, which substantially underreported taxable income and tax liability.

All in violation of Title 18, United States Code, Section 371.

THE UNITED STATES FURTHER CHARGES:

COUNT 2

That on or about April 15, 2011, in the Middle District of Pennsylvania,

SANDY TALADA,

a resident of Sayre, Pennsylvania, who during the calendar year 2011 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2010, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their joint taxable income for the calendar year was the sum of \$12,918 and that the amount of tax due and owing thereon was the sum of \$0. In fact, as she then and there knew, their joint taxable income for the calendar year was the sum of \$102,522, upon which joint taxable income there was owing to the United States of America an income tax of \$19,084.

All in violation of Title 26, United States Code, Section 7201.

THE UNITED STATES FURTHER CHARGES:

FORFEITURE ALLEGATION

1. The allegations contained in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of a conspiracy to violate Title 18, United States Code, Section 1341, in violation of Title 18, United States Code, Section 371, the defendants,

RANDY TALADA and SANDY TALADA,

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offenses of which the defendants are convicted, and any property, real or personal, used to facilitate or intended to be used to facilitate the commission of the offenses of which the defendants are convicted. The

property to be forfeited includes, but is not limited to, the following:

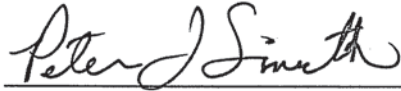
- a. 2007 Honda Cruiser, motorcycle VIN # 18HFSC52647A40;
- b. 2011 Forest River - V-Cross Camper, VIN #
4X4TVCH26BU100468;
- c. Approximately \$1000 in United States Currency;
- d. Contents of Ingersoll Rand Federal Credit Union Savings
Account # 9729-019; and
- e. Contents of Ingersoll Rand Federal Credit Union Checking
Account # 9729-079.

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute

property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



PETER J. SMITH BY T&H
United States Attorney

12-27-13

Date